

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ALEXIA CARUSO, a minor, by her
NEXT FRIEND, MICHELLE WHITE,

Plaintiffs,

v.

Case No: 12-CV-13896
Hon. Lawrence P. Zatkoff
Magistrate Hluchaniuk

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY, a foreign
Company,

Defendant.

Miller & Tischler, P.C.
Maureen H. Kinsella (P56172)
Attorneys for Plaintiff
26711 Northwestern Highway
Suite 200
Southfield, MI 48033-2159
(248) 945-1040

Clark & Schoenbeck, P.C.
Paul S. Clark P39164)
Attorneys for Quality Care Consulting
22655 South Chrysler Drive
Hazel Park, MI 48030
(248) 543-7776

Zausmer, Kaufman, August,
Caldwell & Tayler, P.C.
Marcy A. Tayler (P41685)
Cinnamon A. Rice (P60979)
Nathan J. Fink (P75185)
Attorneys for Defendant
31700 Middlebelt Road
Suite 150
Farmington Hills, MI 48334
(248) 851-4111

NOTICE OF HEARING

TO: Miller & Tischler, P.C.
Maureen H. Kinsella
Attorneys for Plaintiff
26711 Northwestern Highway
Suite 200
Southfield, MI 48033-2159

Zausmer, Kaufman, August,
Caldwell & Tayler, P.C.
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Farmington Hills, MI 48334

PLEASE TAKE NOTICE that the attached Motion to Intervene will be brought on
for hearing before the Honorable Lawrence P. Zatkoff in his courtroom in the U.S.

District Court, Detroit, Michigan on a date and at a time to be set by this Honorable Court.

CLARK & SCHOENBECK, P.C.

By: /s/ Paul S. Clark
Paul S. Clark (P39164)
22655 South Chrysler Drive
Hazel Park, MI 48030
(248) 543-7776

Dated: November 9, 2012

PROOF OF SERVICE

I certify that on November 9, 2012, I did electronically serve the attached document with the U. S. District Court and service was made on all counsel via the U. S. District Court's electronic service system.

CLARK & SCHOENBECK, P.C.

By: /s/ Paul S. Clark
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Attorneys for Quality Care Consulting
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MOTION TO INTERVENE

NOW COMES Quality Care Consulting, by and through its attorneys,
Clark & Schoenbeck, P.C. and for its Motion to Intervene, states as follows:

1. Quality Care Consulting provided services to Plaintiff Alexia Caruso, a minor.
2. These case management services were provided from December 2, 2011 until May 6, 2012.

3. The total amount owed to Quality Care Consulting is \$4,128.00.
4. Demand was made to State Farm Mutual Automobile Insurance Company for payment and reasonable proof of the provision of these services was provided in a timely manner to State Farm Mutual Automobile Insurance Company.
5. Quality Care Consulting claims interest relating to the transaction that is the subject of this present action, and that disposing of this action without including Quality Care Consulting as a party will impair and impede its ability to protect its interest.
6. Plaintiff's counsel, while extremely competent, could not adequately protect the interests of Quality Care Consulting as her loyalties lie directly with the Plaintiff.

WHEREFORE, Quality Care Consulting asks this Honorable Court to grant an order allowing it to intervene against State Farm Mutual Automobile Insurance Company as a Plaintiff and to grant any other relief which is just and equitable in the above referenced cause of action.

CLARK & SCHOENBECK, P.C.

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Attorneys for Quality Care Consulting
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(586) 543-7776

Dated: November 9, 2012

Quality Care Consultants
Statement Summaries
DOS: 11/11 – 5/12

<u>Patient</u>	<u>Statement Description</u>	<u>Statement Number</u>	<u>Billing Amount</u>	<u>Amount Paid</u>	<u>Amount Due</u>
Alexia Caruso	Statement w_Numbers (Invoice) - Caruso, Alexia - 01_10_2012	4242	\$636.54	\$0.00	\$636.54
Alexia Caruso	Statement w_Numbers (Invoice) - Caruso, Alexia - 02_11_2012	4479	\$754.68	\$0.00	\$754.68
Alexia Caruso	Statement w_Numbers (Invoice) - Caruso, Alexia - 03_06_2012	4646	\$978.75	\$0.00	\$978.75
Alexia Caruso	Statement w_Numbers (Invoice) - Caruso, Alexia - 04_06_2012	4917	\$733.68	\$0.00	\$733.68
Alexia Caruso	Statement without Assessment Plan (Invoice) - Caruso, Alexia - 05_06_2012	5145	\$1025.16	\$0.00	\$1025.16
				Revenue	\$0.00
				SUBTOTAL	\$4128.81
	TOTALS		\$4128.81	\$0.00	\$4128.81

STATEMENT

02/01/2012

Quality Care Consulting
19811 Farmington Road
Livonia, MI 48152
248-888-0066

State Farm
PO Box 661023
Dallas, TX 75266
Claim Number: 22A-480-550
Adjuster's Name: Joe Kuchuiclki

Patient's Name: Alexia Caruso**DOB:** 07/08/2005**DOL:** 03/10/2006**Clinician Name:** Linda Pillow L.M.S.W., A.C.S.W.,
C.B.I.S.**Federal Tax ID #:** 38-3523216**Invoice #:** 4479**Diagnostic Code:** 294.1 Dementia due to Head Trauma (Pelshaw 2011, QCC)

DATE	HOURS/UNITS	CASE MANAGEMENT	Fee Per Hr	TOTAL
01/05/2012	0.5/5u hr/u	Contact with Speech Therapist	\$105.00	\$52.50
01/19/2012	3.2/32 hr/u	Meeting with patient, mother, and therapist 18 miles @ \$0.51 per mile	\$105.00	\$336.00 \$9.18
01/20/2012	1.9/19 hr/u	Eval/Maint. of Est. Pt. Completed PRL (see Progress Report Provider Rx Log) Charles Pelshaw 11-10-11; IEP 12-6-11	\$105.00	\$199.50
01/31/2012	0.5/5 hr/u	Assessment Plan/Upcoming Appt.	\$105.00	\$52.50
	1.0/10 hr/u	Monthly Progress Report	\$105.00	\$105.00
	7.1 hr/u		SUBTOTAL	\$754.68

TOTAL **\$754.68**

STATEMENT

01/01/2012

Quality Care Consulting
19811 Farmington Road
Livonia, MI 48152
248-888-0066

State Farm
PO Box 661023
Dallas, TX 75266
Claim Number: 22A-480-550
Adjuster's Name: Joe Kuchuiclki

Patient's Name: Alexia Caruso
DOB: 07/08/2005
DOL: 03/10/2006

Clinician Name: Linda Pillow L.M.S.W., A.C.S.W.,
C.B.I.S.
Federal Tax ID #: 38-3523216
Invoice #: 4242

Diagnostic Code: 294.1 Dementia due to Head Trauma (Pelshaw 2011, QCC)

DATE	HOURS/UNITS	CASE MANAGEMENT	Fee Per Hr	TOTAL
12/02/2011	3.0/30 hr/u	Appt. Preparation Contact with Family Contact with the pt. 54 miles @ \$0.51 per mile	\$105.00	\$315.00
12/15/2011	0.2/2 hr/u	Collaboration	\$105.00	\$27.54
12/21/2011	0./22 hr/u	Contact with Family	\$105.00	\$21.00
12/22/2011	0.6/6 hr/u	Compiled Tables for Diagnostic Profile, Diagnostic Tests, Medications, Medical Providers; Contact with Mr. Katowski	\$105.00	\$63.00
12/23/2011	0.3/3 hr/u	Contact with Eastpointe School Contact with Speech Pathologist	\$105.00	\$31.50
12/30/2011	0.5/5 hr/u	Assessment Plan/Upcoming Appt.	\$105.00	\$52.50
	1.0/10 hr/u	Monthly Progress Report	\$105.00	\$105.00
	5.8 hr/u		SUBTOTAL	\$636.54

TOTAL **\$636.54**

STATEMENT

03/01/2012

Quality Care Consulting
19811 Farmington Road
Livonia, MI 48152
248-888-0066

State Farm
 PO Box 661023
 Dallas, TX 75266
 Claim Number: 22A-480-550
 Adjuster's Name: Joe Kuchuielki

Patient's Name: Alexia Caruso
DOB: 07/08/2005
DOL: 03/10/2006

Clinician Name: Linda Pillow L.M.S.W., A.C.S.W.,
C.B.I.S.
Federal Tax ID #: 38-3523216
Invoice #: 4646

Diagnostic Code: 294.1 Dementia due to Head Trauma (Pelshaw 2011, QCC)

DATE	HOURS/UNITS	CASE MANAGEMENT	Fee Per Hr	TOTAL
02/06/2012	2.5/7 hr/u	Contact with Children's Hospital Rehabilitation Services Contact with	\$105.00	\$262.50
02/08/2012	1.1/11 hr/u	Treatment and Case Management	\$105.00	\$115.50
02/16/2012	0.9/9 hr/u	A consultation with OT Children's Hospital; Speech Therapist Forest Park Elementary Contact with Insurer	\$105.00	\$94.50
02/17/2012	2.3/23 hr/u	A consultation with Ms. Pangori, Speech Therapist FTF Contact 25 miles @ \$0.51 per mile	\$105.00	\$241.50
02/22/2012	0.4/4 hr/u	Coordination of medical appointment	\$105.00	\$42.00
02/23/2012	0.2/2 hr/u	Contact with Children's Hospital; patient's mother	\$105.00	\$21.00
02/24/2012	0.3/3 hr/u	Contact with Children's Hospital, billing	\$105.00	\$31.50
02/29/2012	0.5/5 hr/u	Assessment Plan/Upcoming Appt.	\$105.00	\$52.50
	1.0/10 hr/u	Monthly Progress Report	\$105.00	\$105.00
	9.2 hr/u		SUBTOTAL	\$978.75

TOTAL **\$978.75**

STATEMENT

04/01/2012

Quality Care Consulting
19811 Farmington Road
Livonia, MI 48152
248-888-0066

State Farm
PO Box 661023
Dallas, TX 75266
Claim Number: 22A-480-550
Adjuster's Name: Joe Kucharski

Patient's Name: Alexia Caruso
DOB: 07/08/2005
DOL: 03/10/2006

Clinician Name: Linda Pillow L.M.S.W., A.C.S.W.,
C.B.I.S.
Federal Tax ID #: 38-3523216
Invoice #: 4917

Diagnostic Code: 294.1 Dementia due to Head Trauma (Pelshaw 2011, QCC)

DATE	HOURS/UNITS	CASE MANAGEMENT	Fee Per Hr	TOTAL
03/08/2012	3.0/30 hr/u	Appt. with Appt. with Charles Pelshaw, MD 18 miles @ \$0.51 per mile	\$105.00	\$315.00
03/16/2012	1.2/12 hr/u	Contact with Insurer	\$105.00	\$9.18
03/20/2012	0.5/5 hr/u	Contact with Insurer	\$105.00	\$126.00
03/26/2012	0.3/3 hr/u	Collaboration Stepping Stones	\$105.00	\$52.50
03/29/2012	0.4/4 hr/u	Contact with Family	\$105.00	\$31.50
03/31/2012	0.5/5 hr/u	Assessment Plan/Upcoming Appt.	\$105.00	\$42.00
	1.0/10 hr/u	Monthly Progress Report	\$105.00	\$52.50
			\$105.00	\$105.00
	6.9 hr/u			
			SUBTOTAL	\$733.68

TOTAL **\$733.68**

STATEMENT

05/01/2012

Quality Care Consulting
19811 Farmington Road
Livonia, MI 48152
248-888-0066

State Farm
PO Box 661023
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Adjuster's Name: Joe Kucharski

Patient's Name: Alexia Caruso**DOB: 07/08/2005****DOL: 03/10/2006****Clinician Name: Linda Pillow L.M.S.W., A.C.S.W., C.B.I.S.****Federal Tax ID #: 38-3523216****Invoice #: 5145****Diagnostic Code: 294.1 Dementia due to Head Trauma (Pelshaw 2011, QCC)**

DATE	HOURS/UNITS	CASE MANAGEMENT	Fee Per Hr	TOTAL
04/06/2012	0.5/5 hr/u	Appt. Preparation	\$105.00	\$52.50
04/07/2012	2.6/26 hr/u	Appt. with Angela DeBastos, Ph.D. 58 miles @ \$0.51 per mile	\$105.00	\$273.00 \$29.58
04/16/2012	0.2/2 hr/u	Contact with Family Michelle White	\$105.00	\$21.00
04/18/2012	0.6/6 hr/u	A communication to Mr. Cochrane	\$105.00	\$63.00
04/23/2012	0.4/4 hr/u	Contact with Family	\$105.00	\$42.00
04/26/2012	0.1/1 hr/u	A communication with Mr. Cochrane	\$105.00	\$10.50
04/28/2012	3.6/36 hr/u	Appt. with Angela DeBastos, Ph.D. Plan Goals Review 58 miles @ \$0.51 per mile	\$105.00	\$378.00 \$29.58
04/30/2012	0.2/2 hr/u	Multiple Contacts Michele White; Ralph Cochrane	\$105.00	\$21.00
04/30/2012	1.0/10 hr/u	Monthly Progress Report	\$105.00	\$105.00
	9.2 hr/u		SUBTOTAL	\$1025.16

TOTAL**\$1025.16**

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BRIEF IN SUPPORT OF MOTION TO INTERVENE

In support of its Motion to Intervene, Quality Care Consulting cites the facts and circumstances stated in the Motion and Rule 24(a)(2).

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